

1 **THE ROSEN LAW FIRM, P.A.**

2 Laurence M. Rosen, Esq. (SBN 219683)

3 Pronouns: he/him/his

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9 *[Proposed] Lead Counsel for*

10 *Movant and the Class*

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 MARK YOUNG, Individually and on Behalf
14 of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 SOLANA LABS, INC.; THE SOLANA
18 FOUNDATION; ANATOLY
19 YAKOVENKO; MULTICOIN CAPITAL
20 MANAGEMENT LLC; KYLE SAMANI;
21 and FALCONX LLC,

22 Defendants.

23 Case No. 3:22-cv-03912-JD

24) **DECLARATION OF LAURENCE**
25) **M. ROSEN IN SUPPORT OF**
26) **OPPOSITION OF MOHAMMED**
27) **RASHID TO COMPETING LEAD**
28) **PLAINTIFF MOTION**

1) CLASS ACTION

2) Judge: James Donato

3) Hearing Date: October 13, 2022

4) Time: 10:00 AM

5) Ctrm: 11 – 19th Floor (San Francisco)

1 I, Laurence M. Rosen, declare:

2 1. I am an attorney duly licensed to practice in the State of California and before
3 this Court. I am the managing partner of The Rosen Law Firm, P.A., attorneys for movant
4 Mohammed Rashid (“Movant”). I make this declaration in support of Movant’s Opposition to
5 Competing Lead Plaintiff Motion. I have personal knowledge of the matters stated herein and if
6 called as a witness, I could and would competently testify thereto.

7 2. Attached hereto are true and correct copies of the following documents:

Exhibit A: *Crypto Leaks* Report entitled “Ava Labs (Avalanche) attacks Solana & cons SEC in evil conspiracy with bought law firm, Roche Freedman” as updated August 31, 2022 and retrieved September 20, 2022;

Exhibit B: Letter Response to Kyle Roche’s motion for withdrawal in *In re Tether and Bitfinex Crypto Asset Litigation*, case no. 1:19-cv-09236-KPF, by BFXNA Inc., BFXWW Inc., Giancarlo Devasini, DigFinex Inc., Tether Holdings Limited, Tether International Limited, Tether Limited, Tether Operations Limited, iFinex Inc., and Ludovicus Jan van der Velde; and

Exhibit C: Letter Response to Kyle Roche’s motion for withdrawal in *In re Tether and Bitfinex Crypto Asset Litigation*, case no. 1:19-cv-09236-KPF, by Bittrex, Inc. and Poloniex, LLC.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 20th of September 2022.

THE ROSEN LAW FIRM, P.A.

/s/ Laurence M. Rosen
Laurence M. Rosen, Esq. (SBN #219683)

PROOF OF SERVICE

I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

I am the managing partner of The Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071. I am over the age of eighteen.

On September 20, 2022, I electronically filed the following **DECLARATION OF LAURENCE M. ROSEN IN SUPPORT OF OPPOSITION OF MOHAMMED RASHID TO COMPETING LEAD PLAINTIFF MOTION** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to counsel of record.

Executed on September 20, 2022.

/s/ Laurence M. Rosen
Laurence M. Rosen